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WALTER WILHELM LAW GROUP A Professional Corporation Riley C. Walter #91839 Kathleen D. DeVaney #156444 Danielle J. Bethel #315945 205 East River Park Circle, Ste. 410 Fresno, CA 93720 Telephone: (559) 435-9800 Facsimile: (559) 435-9868 E-mail: rilevwalter@w2lg.com 6 Chapter 9 Counsel 8

IN THE UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA

FRESNO DIVISION

In re TULARE LOCAL HEALTHCARE DISTRICT, dba TULARE REGIONAL MEDICAL CENTER, Debtor.

HEALTHCARE CONGLOMERATE ASSOCIATES, LLC,

Plaintiff,

٧.

TULARE LOCAL HEALTHCARE DISTRICT, dba TULARE REGIONAL MEDICAL CENTER: DOES 1 through 20,

Defendants.

STIPULATION TO CONTINUE ADVERSARY PROCEEDING STATUS

HEARING AND ORDER THEREON

Date:

September 26, 2018

Time:

1:30 p.m.

CASE NO. 17-13797

Adv. No.: 17-01095

Chapter 9

Place:

2500 Tulare Street

Fresno, CA 93721 Courtroom 13

Judge:

Honorable René Lastreto II

IT IS HEREBY STIPULATED AND AGREED by and between Healthcare Conglomerate Associates, LLC and Tulare Local Healthcare District, by counsel, as follows.

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Hearing and Order Thereon

00193321-gaa-09.18.2018

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- 1. On December 28, 2017 Tulare Local Healthcare District removed to this court an action ("Removed Action") that had been filed in the Superior Court for the County of Los Angeles.
- 2. On January 24, 2018 Healthcare Conglomerate Associates, LLC filed a Motion for Remand of Lawsuit to State Court Pursuant to 28. U.S.C. § 1452(b), D.C. No. OHS-1, which is presently set for hearing on December 19, 2018 at 1:30 p.m.
- 3. On January 29, 2018 Healthcare Conglomerate Associates, LLC filed a Motion to Dismiss Counterclaim Against HCCA or in the Alternative Strike Portions Thereof, D.C. No. OHS-2, and Motion to Strike Portions of Answer of Tulare Local Healthcare District dba Tulare Regional Medical Center, D.C. No. OHS-3, which are now each set for hearing on December 19, 2018 at 1:30 p.m.
- 4. An Adversary Proceeding Status Conference in this matter is currently scheduled for September 26, 2018 at 1:30 p.m.
- The parties have discussed this matter and agree that the Adversary 5. Proceeding Status Conference should be continued to December 19, 2018 at 1:30 p.m. in Fresno to be heard concurrently with the hearings on OHS-1, OHS-2 and OHS-3.
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6. The parties stipulate and agree to entry of a court order approving this 2 stipulation. 3 IT IS SO STIPULATED. KLEIN, DeNATALE, GOLDNER, ROSENLIEB & KIMBALL LLP 6 7 Hagop T. Bedoyan, Attorneys for 8 Healthcare Conglomerate Associates, LLC 9 WALTER WILHELM LAW GROUP 10 11 les C. Walter By: 12 Riley C. Walter, Attorneys for Tulare Local Healthcare District 13 14 15 16 17 18 19 20 21 22 <u>ORDER</u> 23 24 Per the Stipulation of the Parties, it is so ordered. 25 Dated: Sep 19, 2018 By the Court 26 27 Judge Lastreto 28 United States Bankruptcy Court Stipulation to Continue Hearing and Order Thereon

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